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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

JACQUELINE ESCOBAR &
JOHN aka JACK SILVA,

PLAINTIFFS,

v.

JEL EVENTS, INC D/B/A ALLIEDPRA
DESTINATION MANAGEMENT LAS
VEGAS, BOB GAIL ENTERPRISES, INC
D/B/A BOB GAIL SPECIAL EVENTS LAS
VEGAS, MGM GRAND HOTEL, LLC AND
MGM RESORTS INTERNATIONAL D/B/A
MGM GRAND LAS VEGAS (MGM
DEFENDANTS),

DEFENDANTS.

CASE NO.: 2:13-cv-01917-JCM-CWH

JOINT STIPULATION AND ORDER
TO EXTEND DISCOVERY
(FOURTH REQUEST)

All of the parties hereto, and for good cause described in this stipulation, and in accord
with Local Rule 26-4, the parties hereby request this Honorable Court adopt and approve this

1 stipulated extension to the discovery plan, and continue the discovery deadlines as requested
2 herein.

3 **I. LOCAL RULE 6-1 IS SATISFIED**

4 This is the fourth request for extension of discovery deadlines filed by the parties. On
5 **November 24, 2014**, the parties filed their third joint stipulation seeking an extension of
6 discovery. Pursuant to this court's order dated **December 1, 2014**, this Honorable Court granted
7 in part the requested extension to enlarge deadlines. In said order, the court noted that the
8 following dates would govern for purposes of discovery:

- | | | |
|----|--|----------------|
| 9 | 1. Discovery Cutoff Date: | May 11, 2015 |
| 10 | 2. Motions to amend pleadings and add parties: | May 13, 2014 |
| 11 | 3. Expert Designations: | March 12, 2015 |
| 12 | 4. Rebuttal Expert Designations: | April 13, 2015 |
| 13 | 5. Interim Status Reports: | March 12, 2015 |
| 14 | 6. Dispositive Motions: | June 10, 2015 |
| 15 | 7. Joint Pre-Trial Order: | July 10, 2015 |

16 The parties have diligently participated in discovery since the third extension was granted
17 and prior thereto, as noted in the first and second joint stipulations to extend discovery.
18 Currently, the Plaintiffs and Defendant Jel Events, Inc settlement was reached through arms-
19 length negotiations. The settling parties' counsel began negotiating the settlement on **March 6,**
20 **2015**. On **March 10, 2015**, the Plaintiffs reached a settlement with Defendant Jel Events, Inc,
21 conditioned upon a good faith determination by the courts, for **\$7,500**. On **March 11, 2015**,
22 counsel for Defendant Jel Events, Inc filed a Motion for Determination of Good Faith Settlement
23 and for Order Shortening Time. At this time, the parties are awaiting a response from the courts
24 regarding the good faith determination.
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26
27

1 The parties had agreed to a stay of discovery in order to engage in settlement
2 negotiations. Though efforts were taken to settle between the Plaintiffs and the Defendants Bob
3 Gail Enterprises, Inc and MGM, the parties were unable to reach a settlement. As a result, the
4 parties have scheduled to conduct a mediation on **Tuesday, May 19, 2015** at **Bongiovi Dispute**
5 **Resolutions** located at **9510 West Sahara Avenue, Las Vegas, Nevada**. All parties have
6 agreed. Moreover, Plaintiff's counsel and Plaintiffs Jacqueline Escobar & John aka Jack Silva
7 will return to Las Vegas from Massachusetts to attend the mediation.

8 Although the parties agreed to a stay of discovery, all parties felt requesting a
9 continuance would adequately provide the parties with additional time, in case a settlement was
10 not reached on **May 19, 2015**. As a result, all parties agreed and requested that the tracking
11 deadlines be enlarged by 90 days to allow time for the parties to mediate, depositions and
12 completion of discovery.

13 The instant request comports with LR 6.1, in that no request is currently being made after
14 the expiration of the specified period noted in this court's order of **December 1, 2014**.

15 **II. LOCAL RULE 26-4 IS SATISFIED**

16 The instant request to extend discovery satisfies the requisites of LR 26-4. Preliminarily,
17 this stipulation and order is received by the court no later than twenty one (21) days before the
18 expiration of the subject deadlines. The dispositive motion and joint pretrial order deadlines are
19 all more than twenty one (21) days from the filing of the instant stipulation and order.¹

20 Additionally, good cause exists for the extension. All parties have agreed and are
21 scheduled to conduct a mediation on **Tuesday, May 19, 2015**, with the hopes of settling and
22 resolving this matter. Unfortunately, if the parties are unable to reach a settlement agreement on
23 **May 19, 2015**, the parties would require additional time to schedule depositions and to complete
24 discovery. As a result, all parties have requested that the tracking deadlines be extended 90 days,

25 ¹ The parties mutually agreed to withhold conducting discovery so as to save costs with the purpose of determining
26 whether the case could be resolved through the mediation scheduled for May 19, 2015. This stipulation is being
27 filed 21 days before all deadlines except discovery.

to which all parties have agreed. Listed below is a statement specifying the discovery completed in this case:

Plaintiffs, Jacqueline Escobar & John aka Jack Silva's Initial Disclosures made Pursuant to LR 26-1 and FRCP 26(a)(1)	12/13/13	ESCOBAR & SILVA completed
Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas Initial Disclosures Pursuant to Pursuant to LR 26-1 and FRCP (a)(1)	12/20/13	JEL EVENTS completed
Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Initial Disclosures Pursuant to LR 26-1 and FRCP 26(a)(1)	12/20/13	MGM completed
Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1)	1/10/14	JEL EVENTS completed
Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Initial Disclosures Pursuant to LR 26-1 and FRCP (a)(1)	1/14/14	BOB GAIL completed
Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Request for Production of Documents to Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas	1/17/14	JEL EVENTS completed
Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Request for Production of Documents to Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas	1/17/14	JEL EVENTS completed
Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Set of Interrogatories to the Plaintiff, Jacqueline Escobar	1/17/14	JEL EVENTS completed
Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Set of Interrogatories to the Plaintiff, John aka Jack Silva	1/17/14	JEL EVENTS completed

1	Defendant, Jel Events, Inc d/b/a AlliedPRA	1/17/14	JEL EVENTS
2	Destination Management Las Vegas First Request for		completed
3	Production of Documents to the Plaintiff, Jacqueline		
4	Escobar		
5	Defendant, Jel Events, Inc d/b/a AlliedPRA	1/17/14	JEL EVENTS
6	Destination Management Las Vegas First Request for		completed
7	Production of Documents to the Plaintiff, John aka		
8	Jack Silva		
9	Defendants, MGM Grand Hotel, LLC and MGM	1/22/14	MGM
10	Resorts International d/b/a MGM Grand Las Vegas		completed
11	First Set of Interrogatories to the Plaintiff, Jacqueline		
12	Escobar		
13	Defendants, MGM Grand Hotel, LLC and MGM	1/22/14	MGM
14	Resorts International d/b/a MGM Grand Las Vegas		completed
15	First Set of Interrogatories to the Plaintiff, John aka		
16	Jack Silva		
17	Defendants, MGM Grand Hotel, LLC and MGM	1/22/14	MGM
18	Resorts International d/b/a MGM Grand Las Vegas First		completed
19	Request for Production of Documents to the Plaintiff,		
20	Jacqueline Escobar		
21	Defendants, MGM Grand Hotel, LLC and MGM	1/22/14	MGM
22	Resorts International d/b/a MGM Grand Las Vegas		completed
23	First Request for Production of Documents to the		
24	Plaintiff, John aka Jack Silva		
25	Defendants, MGM Grand Hotel, LLC and MGM	1/22/14	MGM
26	Resorts International d/b/a MGM Grand Las Vegas		completed
27	First Request for Admissions to the Plaintiff,		
	Jacqueline Escobar		
	Plaintiff, Jacqueline Escobar's First Set of	1/27/14	ESCOBAR
	Interrogatories to Defendant, Jel Events, Inc d/b/a		completed

AlliedPRA Destination Management Las Vegas

Plaintiff, John aka Jack Silva's First Set of Interrogatories to Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas	1/27/14	SILVA completed
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Plaintiffs, Jacqueline Escobar & John aka Jack Silva's First Request for Production of Documents to Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas	1/27/14	ESCOBAR & SILVA completed
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Plaintiffs, Jacqueline Escobar & John aka Jack Silva's First Request for Admissions to Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas	1/27/14	ESCOBAR & SILVA completed
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Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Notice of taking the Deposition of the Custodian of record of Clark County American Medical Response (Escobar)	1/30/14	MGM amended
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Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Notice of taking the Deposition of the Custodian of record of Balance Physical Therapy/Balance Rehabilitation and Health Sciences (Escobar)	1/30/14	MGM completed
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Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Notice of taking the Deposition of the Custodian of record of Massachusetts General Hospital	1/30/14	MGM completed
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Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Notice of taking the Deposition of the Custodian of record of Desert Surgical Associates (Escobar)	1/30/14	MGM completed
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Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Notice of taking the Deposition of the Custodian of record of Derry Medical Center (Escobar)	1/30/14	MGM completed
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Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas	1/30/14	MGM completed
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1 Notice of taking the Deposition of the Custodian of
2 record of Sunrise Hospital and Medical Center
(Escobar)

3 Defendants, MGM Grand Hotel, LLC and MGM 1/30/14 MGM
4 Resorts International d/b/a MGM Grand Las Vegas completed
5 Notice of taking the Deposition of the Custodian of
6 record of Appledore Medical Group/Parkland Internal
7 Medicine of Londonderry (Silva)

8 Defendants, MGM Grand Hotel, LLC and MGM 1/30/14 MGM
9 Resorts International d/b/a MGM Grand Las Vegas completed
10 Notice of taking the Deposition of the Custodian of
11 record of New Hampshire Orthopaedic Center (Silva)

12 Defendants, MGM Grand Hotel, LLC and MGM 1/30/14 MGM
13 Resorts International d/b/a MGM Grand Las Vegas completed
14 Notice of taking the Deposition of the Custodian of
15 record of Sunrise Hospital and Medical Center (Silva)

16 Defendants, MGM Grand Hotel, LLC and MGM 1/30/14 MGM
17 Resorts International d/b/a MGM Grand Las Vegas completed
18 Notice of taking the Deposition of the Custodian of
19 record of Appledore Medical Group Beacon Internal
20 Medicine (Silva)

21 Subpoena to Clark County American Medical 1/30/14 MGM
22 Response (Escobar) amended

23 Subpoena to Balance Physical Therapy/Balance 1/30/14 MGM
24 Rehabilitation and Health Sciences (Escobar) completed

25 Subpoena to Massachusetts General Hospital 1/30/14 MGM
26 completed

27 Subpoena to Desert Surgical Associates (Escobar) 1/30/14 MGM
completed

Subpoena to Derry Medical Center (Escobar) 1/30/14 MGM
completed

Subpoena to Sunrise Hospital and Medical Center 1/30/14 MGM
(Escobar) completed

1	Subpoena to Appledore Medical Group/Parkland Internal Medicine of Londonderry (Silva)	1/30/14	MGM completed
2	Subpoena to New Hampshire Orthopaedic Center (Silva)	1/30/14	MGM completed
4	Subpoena to Sunrise Hospital and Medical Center (Silva)	1/30/14	MGM completed
6	Subpoena to Appledore Medical Group Beacon Internal Medicine (Silva)	1/30/14	MGM completed
8	Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Amended Notice of taking the Deposition of the Custodian of Records of Clark County American Medical Response (Escobar)	2/14/14	MGM completed
11	Amended Subpoena to Clark County American Medical Response (Escobar)	2/14/14	MGM completed
13	Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas First Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1)	2/19/14	MGM completed
16	Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Responses to Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Request for Production of Documents	2/19/14	MGM completed
19	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas First Set of Interrogatories to the Plaintiff, Jacqueline Escobar	2/21/14	BOB GAIL completed
21	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas First Set of Interrogatories to the Plaintiff, John aka Jack Silva	2/21/14	BOB GAIL completed
23	Plaintiff, Jacqueline Escobar's Responses to Defendant, Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas First Request for Production of Documents	3/18/14	ESCOBAR completed
26	Defendants, MGM Grand Hotel, LLC and MGM	3/19/14	MGM

1	Resorts International d/b/a MGM Grand Las Vegas		completed
2	Second Supplement to Disclosures Made Pursuant to		
	LR 26-1 and FRCP (a)(1)		
3	Plaintiff, Jacqueline Escobar's Responses to	3/19/14	ESCOBAR
4	Defendants, MGM Grand Hotel, LLC and MGM		completed
5	Resorts International d/b/a MGM Grand Las Vegas		
	First Request for Production of Documents		
6	Defendant, Jel Events, Inc d/b/a AlliedPRA	3/21/14	JEL EVENTS
7	Destination Management Las Vegas Responses to		completed
8	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's		
	First Request for Production of Documents		
9	Plaintiff, John aka Jack Silva's Responses to	3/21/14	SILVA
10	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination		completed
11	Management Las Vegas First Request for Production		
	of Documents		
12	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination	3/24/14	JEL EVENTS
13	Management Las Vegas Second Supplement to		completed
14	Disclosures Made Pursuant to LR 26-1 and FRCP		
	(a)(1)		
15	Plaintiff, John aka Jack Silva's Responses to	3/24/14	SILVA
16	Defendants, MGM Grand Hotel, LLC and MGM		completed
	Resorts International d/b/a MGM Grand Las Vegas		
	First Request for Production of Documents		
17	Plaintiff, John aka Jack Silva's Answers to Defendants,	3/26/14	SILVA
18	MGM Grand Hotel, LLC and MGM Resorts		completed
19	International d/b/a MGM Grand Las Vegas First Set of		
	Interrogatories		
20	Subpoena to Herbalife International (Escobar)	3/26/14	JEL EVENTS
21			completed
22	Subpoena to Desert Surgical Associates (Escobar)	3/26/14	JEL EVENTS
23			completed
24	Subpoena to Sunrise Hospital and Medical Center	3/26/14	JEL EVENTS
	(Escobar)		completed
25	Subpoena to American Medical Response (Escobar)	3/26/14	JEL EVENTS
26			completed

1	Plaintiff, John aka Jack Silva's Responses to	3/27/14	SILVA
2	Defendants, MGM Grand Hotel, LLC and MGM		completed
3	Resorts International d/b/a MGM Grand Las Vegas		
	First Request for Admissions		
4	Plaintiff, John aka Jack Silva's Answers to Defendant,	3/27/14	SILVA
5	Jel Events, Inc d/b/a AlliedPRA Destination		completed
6	Management Las Vegas First Set of Interrogatories		
7	Subpoena to Herbalife International (Silva)	3/27/14	JEL EVENTS
8			completed
9	Subpoena to Sunrise Hospital and Medical Center	3/27/14	JEL EVENTS
10	(Silva)		completed
11	Plaintiff, Jacqueline Escobar's Answers to Defendant,	3/28/14	ESCOBAR
12	Jel Events, Inc d/b/a AlliedPRA Destination		completed
13	Management Las Vegas First Set of Interrogatories		
14	Plaintiff, Jacqueline Escobar's Answers to Defendants,	3/28/14	ESCOBAR
15	MGM Grand Hotel, LLC and MGM Resorts		completed
16	International d/b/a MGM Grand Las Vegas First Set of		
17	Interrogatories		
18	Plaintiff, Jacqueline Escobar's Responses to	3/28/14	ESCOBAR
19	Defendants, MGM Grand Hotel, LLC and MGM		completed
20	Resorts International d/b/a MGM Grand Las Vegas		
21	First Request for Admissions		
22	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination	3/28/14	JEL EVENTS
23	Management Las Vegas Third Supplement to		completed
24	Disclosures Made Pursuant to LR 26-1 and FRCP		
25	(a)(1)		
26	Plaintiff, Jacqueline Escobar's Answers to Defendant,	4/4/14	ESCOBAR
27	Bob Gail Enterprises, Inc d/b/a Bob Gail Special		completed
	Events Las Vegas First Set of Interrogatories		
	Plaintiff, John aka Jack Silva's Answers to Defendant,	4/4/14	SILVA
	Bob Gail Enterprises, Inc d/b/a Bob Gail Special		completed
	Events Las Vegas First Set of Interrogatories		
	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination	4/9/14	JEL EVENTS

1	Management Las Vegas Answers to Plaintiff, Jacqueline Escobar's First Set of Interrogatories		completed
2	Defendant Bob Gail's First Request for Production of	4/9/14	BOB GAIL
3	Documents to Plaintiff Jacqueline Escobar		completed
4	Defendant Bob Gail's First Request for Production of	4/9/14	BOB GAIL
5	Documents to Plaintiff John aka Jack Silva		completed
6	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination	4/11/14	JEL EVENTS
7	Management Las Vegas Responses to Plaintiffs, Jacqueline Escobar & John aka Jack Silva's First Set of		completed
8	Interrogatories		
9	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination	4/11/14	JEL EVENTS
10	Management Las Vegas Response to Plaintiffs, Jacqueline Escobar & John aka Jack Silva's First		completed
11	Request for Admissions		
12	Defendant, Jel Events, Inc d/b/a AlliedPRA Destination	4/15/14	JEL EVENTS
13	Management Las Vegas Answers to Plaintiff, John aka Jack Silva's First Set of Interrogatories		completed
14	Defendant, Jel Events, Inc d/b/a AlliedPRA	4/23/14	JEL EVENTS
15	Destination Management Las Vegas Fourth		completed
16	Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1)		
17	Plaintiff, Jacqueline Escobar's Responses to Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special	5/8/14	ESCOBAR
18	Events Las Vegas First Request for Production of		completed
19	Documents		
20	Plaintiff, John aka Jack Silva's Responses to	5/8/14	SILVA
21	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail		completed
22	Special Events Las Vegas First Request for Production		
23	of Documents		
24	Defendant, Jel Events, Inc. d/b/a AlliedPRA	5/27/14	JEL EVENTS
25	Destination Management Las Vegas' Fifth Supplement to FRCP 26(a)(1) List of Witnesses and Documents		completed
26	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM

1	Resorts International d/b/a MGM Grand Las Vegas		completed
2	Notice of taking the Deposition of Andrea Escobar		
3	Subpoena to Andrea Escobar	6/2/14	MGM
4			completed
5	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
6	Resorts International d/b/a MGM Grand Las Vegas		completed
7	Notice of taking the Deposition of Jacqueline Escobar		
8	Subpoena to Jacqueline Escobar	6/2/14	MGM
9			Completed
10	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
11	Resorts International d/b/a MGM Grand Las Vegas		amended &
12	Notice of taking the Deposition of Julie Silva		rescheduled
13	Subpoena to Julie Silva	6/2/14	MGM
14			Completed
15	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
16	Resorts International d/b/a MGM Grand Las Vegas		amended &
17	Notice of taking the Deposition of John aka Jack Silva		rescheduled
18	Subpoena to John aka Jack Silva	6/2/14	MGM
19			Completed
20	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
21	Resorts International d/b/a MGM Grand Las Vegas		amended &
22	Notice of taking the Deposition of Dora Lamos		rescheduled
23	Subpoena to Dora Lamos	6/2/14	MGM
24			Completed
25	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
26	Resorts International d/b/a MGM Grand Las Vegas		amended &
27	Notice of taking the Deposition of Tania Pinzon		rescheduled
	Subpoena to Tania Pinzon	6/2/14	MGM
			amended &
			rescheduled
	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
	Resorts International d/b/a MGM Grand Las Vegas		completed
	Notice of taking the Deposition of Christopher Pierce,		
	MSPT		

1	Subpoena to Christopher Pierce, MSPT	6/2/14	MGM
2			Completed
3	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
4	Resorts International d/b/a MGM Grand Las Vegas		amended &
	Notice of taking the Deposition of John Lynn, M.D.		rescheduled
5	Subpoena to John Lynn, M.D.	6/2/14	MGM
6			Completed
7	Defendants, MGM Grand Hotel, LLC and MGM	6/2/14	MGM
8	Resorts International d/b/a MGM Grand Las Vegas		amended &
	Notice of taking the Deposition of Jeffrey Rind, M.D.		rescheduled
9			
10	Subpoena to Jeffrey Rind, M.D.	6/2/14	MGM
11			amended &
			rescheduled
12	Defendants, MGM Grand Hotel, LLC and MGM	6/6/14	MGM
13	Resorts International d/b/a MGM Grand Las Vegas		completed
14	Amended Notice of taking the Deposition of Jeffrey		
	Rind, M.D.		
15	Amended Subpoena to Jeffrey Rind, M.D.	6/6/14	MGM
16			Completed
17	Defendants, MGM Grand Hotel, LLC and MGM	6/6/14	MGM
18	Resorts International d/b/a MGM Grand Las Vegas		completed
	Notice of taking the Deposition of Adam Cohen, M.D.		
19	Subpoena to Adam Cohen, M.D.	6/6/14	MGM
20			Completed
21	Defendants, MGM Grand Hotel, LLC and MGM	6/6/14	MGM
22	Resorts International d/b/a MGM Grand Las Vegas		completed
23	Notice of taking the Deposition of Laura Zekanvoic-		
	Ferraro		
24	Subpoena to Laura Zekanvoic-Ferraro	6/6/14	MGM
25			Completed
26			
27			

1	Defendant, Jel Events, Inc. d/b/a AlliedPRA	6/12/14	JEL EVENTS
2	Destination Management Las Vegas Notice of taking		completed
3	the Deposition of Gabriela Gregory, M.D.		
4	Defendant, Jel Events, Inc. d/b/a AlliedPRA	6/12/14	JEL EVENTS
5	Destination Management Las Vegas Notice of taking		completed
6	the Deposition of John Anson, M.D.		
7	Defendants, MGM Grand Hotel, LLC and MGM	6/13/14	MGM
8	Resorts International d/b/a MGM Grand Las Vegas		completed
9	Amended Notice of taking the Deposition of Tania		
10	Pinzon		
11	Defendants, MGM Grand Hotel, LLC and MGM	6/13/14	MGM
12	Resorts International d/b/a MGM Grand Las Vegas		completed
13	Amended Notice of taking the Deposition of Julie Silva		
14	Defendants, MGM Grand Hotel, LLC and MGM	6/13/14	MGM
15	Resorts International d/b/a MGM Grand Las Vegas		completed
16	Amended Notice of taking the Deposition of John aka		
17	Jack Silva		
18	Defendants, MGM Grand Hotel, LLC and MGM	6/13/14	MGM
19	Resorts International d/b/a MGM Grand Las Vegas		completed
20	Amended Notice of taking the Deposition of John		
21	Lynn, M.D.		
22	Defendant, Jel Events, Inc. d/b/a AlliedPRA	6/25/14	JEL EVENTS
23	Destination Management Las Vegas Sixth Supplement		completed
24	to FRCP 26(a)(1) List of Witnesses and Documents		
25	Defendant, Jel Events, Inc. d/b/a AlliedPRA	6/27/14	JEL EVENTS
26	Destination Management Las Vegas Seventh		completed
27	Supplement to FRCP 26(a)(1) List of Witnesses and		
	Documents		
	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	6/27/14	ESCOBAR & SILVA
	Notice of taking 30(b)(6) Deposition of Bob Gail		revised
	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	6/27/14	ESCOBAR & SILVA
	Notice of taking 30(b)(6) Deposition of Jel Events		revised

1	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	6/27/14	ESCOBAR & SILVA
2	Notice of taking 30(b)(6) Deposition of MGM		revised
3	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	7/1/14	ESCOBAR & SILVA
4	Revised Notice of taking 30(b)(6) Deposition of Bob		completed
5	Gail		
6	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	7/1/14	ESCOBAR & SILVA
7	Revised Notice of taking 30(b)(6) Deposition of Jel		completed
8	Events		
9	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	7/1/14	ESCOBAR & SILVA
10	Revised Notice of taking 30(b)(6) Deposition of MGM		vacated to reschedule
11	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail	7/11/14	BOB GAIL
12	Special Events Las Vegas First Supplement to		completed
13	Disclosures Made Pursuant to LR 26-1 and FRCP		
14	(a)(1)		
15	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	7/15/14	ESCOBAR & SILVA
16	First Request for Production of Documents to		completed
17	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail		
18	Special Events Las Vegas		
19	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/17/14	JEL EVENTS
20	Destination Management Las Vegas Eighth		completed
21	Supplement to FRCP 26(a)(1) List of Witnesses and		
22	Documents		
23	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/21/14	JEL EVENTS
24	Destination Management Las Vegas Notice of Taking		vacated to reschedule
25	Deposition of Allan Macintyre, MD		
26	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/22/14	JEL EVENTS
27	Destination Management Las Vegas Notice to Vacate		completed
	Deposition of Allan Macintyre, MD		
	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
	Resorts International d/b/a MGM Grand Las Vegas		amended
	Notice of taking the Deposition of the Custodian of		
	record of Westchester Medical Center		
	Subpoena to Westchester Medical Center	7/22/14	MGM
			Amended

1	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
2	Resorts International d/b/a MGM Grand Las Vegas		pending
3	Notice of taking the Deposition of the Custodian of		
	record of Dalfino Chiropractic, LLC		
4	Subpoena to Dalfino Chiropractic, LLC	7/22/14	MGM
5			Pending
6	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
7	Resorts International d/b/a MGM Grand Las Vegas		amended
8	Notice of taking the Deposition of the Custodian of		
	record of Hartford Hospital - Head Injury Clinic		
9	Subpoena to Hartford Hospital - Head Injury Clinic	7/22/14	MGM
			Amended
10	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
11	Resorts International d/b/a MGM Grand Las Vegas		amended
12	Notice of taking the Deposition of the Custodian of		
	record of Hartford Hospital		
13	Subpoena to Hartford Hospital	7/22/14	MGM
14			Amended
15	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
16	Resorts International d/b/a MGM Grand Las Vegas		pending
17	Notice of taking the Deposition of the Custodian of		
	record of Hartford Radiology Associates		
18	Subpoena to Hartford Radiology Associates	7/22/14	MGM
19			Pending
20	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
21	Resorts International d/b/a MGM Grand Las Vegas		pending
22	Notice of taking the Deposition of the Custodian of		
	record of Scott Barron & Associates, P.C.		
23	Subpoena to Scott Barron & Associates, P.C.	7/22/14	MGM
			Pending
24	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
25	Resorts International d/b/a MGM Grand Las Vegas		pending
26	Notice of taking the Deposition of the Custodian of		
	record of The Rojas Law Firm		

1	Subpoena to The Rojas Law Firm	7/22/14	MGM
2			Pending
3	Defendants, MGM Grand Hotel, LLC and MGM	7/22/14	MGM
4	Resorts International d/b/a MGM Grand Las Vegas		completed
5	Amended Notice of taking the Deposition of the		
	Custodian of Records of Godfrey Chiropractic		
6	Subpoena to Godfrey Chiropractic	7/22/14	MGM
7			Completed
8	Defendants, MGM Grand Hotel, LLC and MGM	7/23/14	MGM
9	Resorts International d/b/a MGM Grand Las Vegas		pending
10	Notice of taking the Deposition of the Custodian of		
11	record of Planet Fitness		
	Subpoena to Planet Fitness	7/23/14	MGM
12			Pending
13	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/30/14	JEL EVENTS
14	Destination Management Las Vegas Notice of Taking		vacated to reschedule
	Deposition of Annette Machuca, MGM Grand Security		
	Manager		
15	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/30/14	JEL EVENTS
16	Destination Management Las Vegas Notice of Taking		vacated to reschedule
17	Deposition of Cory Shafer, MGM Grand Security		
	Supervisor		
18	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/30/14	JEL EVENTS
19	Destination Management Las Vegas Notice of Taking		vacated & amended
20	Deposition of Debra Jean Duffy, MGM Grand Security		
	Officer		
21	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/30/14	JEL EVENTS
22	Destination Management Las Vegas Notice of Taking		amended &
23	Deposition of Kevin Janson, MGM Grand Security		rescheduled
	Officer		
24	Defendant, Jel Events, Inc. d/b/a AlliedPRA	7/30/14	JEL EVENTS
25	Destination Management Las Vegas Notice of Taking		vacated to reschedule
26	Deposition of Kim Gomez, MGM Grand Security		
	Officer		

1	Defendant, Jel Events, Inc. d/b/a AlliedPRA	8/6/14	JEL EVENTS
2	Destination Management Las Vegas Ninth		completed
3	Supplement to FRCP 26(a)(1) List of Witnesses and		
4	Documents		
5	Defendants, MGM Grand Hotel, LLC and MGM	8/14/14	MGM
6	Resorts International d/b/a MGM Grand Las Vegas		completed
7	Notice of taking the Deposition of the Custodian of		
8	record of Sunrise Hospital and Medical Center -		
9	Radiology Department (Escobar)		
10	Subpoena to Sunrise Hospital and Medical Center -	8/14/14	MGM
11	Radiology Department (Escobar)		completed
12	Defendants, MGM Grand Hotel, LLC and MGM	8/14/14	MGM
13	Resorts International d/b/a MGM Grand Las Vegas		completed
14	Notice of taking the Deposition of the Custodian of		
15	record of Sunrise Hospital and Medical Center -		
16	Radiology Department (Silva)		
17	Subpoena to Sunrise Hospital and Medical Center -	8/14/14	MGM
18	Radiology Department (Silva)		completed
19	Defendant, Jel Events, Inc. d/b/a AlliedPRA	8/15/14	JEL EVENTS
20	Destination Management Las Vegas Amended Notice		completed
21	of Taking Deposition of Kevin Janson, MGM Grand		
22	Security Officer		
23	Defendant, Jel Events, Inc. d/b/a AlliedPRA	8/18/14	JEL EVENTS
24	Destination Management Las Vegas Notice to Vacate		completed
25	Deposition of Annette Machuca, MGM Grand Security		
26	Manager		
27	Defendant, Jel Events, Inc. d/b/a AlliedPRA	8/18/14	JEL EVENTS
	Destination Management Las Vegas Notice to Vacate		completed
	Deposition of Kim Gomez, MGM Grand Security		
	Officer		
	Defendants, MGM Grand Hotel, LLC and MGM	8/18/14	MGM
	Resorts International d/b/a MGM Grand Las Vegas		pending
	Amended Notice of taking the Deposition of the		
	Custodian of record of Hartford Hospital - Head Injury		
	Clinic		

1	Amended Subpoena to Hartford Hospital - Head Injury	8/18/14	MGM
2	Clinic		pending
3	Defendants, MGM Grand Hotel, LLC and MGM	8/18/14	MGM
4	Resorts International d/b/a MGM Grand Las Vegas		completed
5	Amended Notice of taking the Deposition of the		
6	Custodian of record of Hartford Hospital		
7	Amended Subpoena to Hartford Hospital	8/18/14	MGM
8			completed
9	Defendants, MGM Grand Hotel, LLC and MGM	8/21/14	MGM
10	Resorts International d/b/a MGM Grand Las Vegas		completed
11	Third Supplement to Disclosures Made Pursuant to LR		
12	26-1 and FRCP (a)(1)		
13	Defendants, MGM Grand Hotel, LLC and MGM	8/21/14	MGM
14	Resorts International d/b/a MGM Grand Las Vegas		completed
15	Amended Notice of taking the Deposition of the		
16	Custodian of record of Westchester Medical Center		
17	Amended Subpoena to Westchester Medical Center	8/21/14	MGM
18			completed
19	Defendant Bob Gail's Responses to the Plaintiffs,	8/25/14	BOB GAIL
20	Jacqueline Escobar & John aka Jack Silva's First		completed
21	Request for Production of Documents		
22	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail	8/25/14	BOB GAIL
23	Special Events Las Vegas Second Supplement to		completed
24	Disclosures Made Pursuant to LR 26-1 and FRCP		
25	(a)(1)		
26	Defendant, Jel Events, Inc. d/b/a AlliedPRA	9/4/14	JEL EVENTS
27	Destination Management Las Vegas Tenth Supplement		completed
	to FRCP 26(a)(1) List of Witnesses and Documents		
	Defendant, Jel Events, Inc. d/b/a AlliedPRA	9/9/14	JEL EVENTS
	Destination Management Las Vegas Eleventh		completed
	Supplement to FRCP 26(a)(1) List of Witnesses and		
	Documents		
	Amended Notice of Taking Deposition of Plaintiff	9/26/14	JEL EVENTS

1	Jacqueline Escobar		pending
2	Amended Notice of Taking Deposition of Debra Jean Duffy	10/17/14	MGM completed
3	Defendant, Jel Events, Inc. d/b/a AlliedPRA Destination Management Las Vegas Twelfth Supplement to FRCP 26(a)(1) List of Witnesses and Documents	10/30/14	JEL EVENTS completed
4			
5			
6	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's First Supplement to the Initial Disclosure made pursuant to LR 26-1 and FRCP 26(a)(1)	11/12/14	ESCOBAR & SILVA completed
7			
8			
9	Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Fifth Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1)	11/12/14	MGM completed
10			
11			
12	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Second Amended Notice of Neuropsychological Examination	11/14/14	BOB GAIL completed
13			
14	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Notice of Independent Medical Examination	11/14/14	BOB GAIL pending
15			
16	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Notice of Continuance of Taking Deposition of the Plaintiff, Jacqueline Escobar	12/17/14	BOB GAIL completed
17			
18			
19	Defendant, Jel Events, Inc. d/b/a AlliedPRA Destination Management Las Vegas Fourteenth Supplement to FRCP 26(a)(1) List of Witnesses and Documents	1/29/15	JEL EVENTS completed
20			
21	Defendant, Jel Events, Inc. d/b/a AlliedPRA Destination Management Las Vegas Second Set of Requests for Production of Documents to Jacqueline Escobar	1/30/15	JEL EVENTS completed
22			
23			
24	Defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a MGM Grand Las Vegas Sixth Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1)	2/10/15	MGM completed
25			
26			

1	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail	2/10/15	BOB GAIL
2	Special Events Las Vegas Notice of Taking		completed
3	Videotaped, Videoconference Deposition of Dr.		
4	Abraham Mintz		
5	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail	2/10/15	BOB GAIL
6	Special Events Las Vegas Notice of Taking		pending
7	Videotaped, Videoconference Deposition of Dr. Mark		
8	Godfrey		
9	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail	2/10/15	BOB GAIL
10	Special Events Las Vegas Notice of Taking		completed
11	Videotaped, Videoconference Deposition of Dr.		
12	Solomon Aordkian		
13	Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail	2/10/15	BOB GAIL
14	Special Events Las Vegas Notice of Taking		vacated
15	Videotaped, Videoconference Deposition of Dr.		
16	Saran S. Rosner		
17	Defendant, Jel Events, Inc. d/b/a AlliedPRA	2/12/15	JEL EVENTS
18	Destination Management Las Vegas Fifteenth		completed
19	Supplement to FRCP 26(a)(1) List of Witnesses and		
20	Documents		
21	Defendant, Jel Events, Inc. d/b/a AlliedPRA	2/19/15	JEL EVENTS
22	Destination Management Las Vegas Sixteenth		completed
23	Supplement to FRCP 26(a)(1) List of Witnesses and		
24	Documents		
25	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	2/23/15	ESCOBAR
26	Notice of Continuing 30(b)(6) Deposition of Bob Gail		revised & rescheduled
27	Plaintiff Jacqueline Escobar's Responses to	2/23/15	ESCOBAR
	Defendant Jel Events, Inc. d/b/a AlliedPRA		pending
	Destination Management Las Vegas Second Set of		
	Requests for Production of Documents		
	Defendants, MGM Grand Hotel, LLC and MGM	2/23/15	MGM
	Resorts International d/b/a MGM Grand Las Vegas		pending
	Second Set of Interrogatories to Plaintiff John aka		
	Jack Silva		
	Defendants, MGM Grand Hotel, LLC and MGM	2/23/15	MGM

1	Resorts International d/b/a MGM Grand Las Vegas		pending
2	Second Set of Request for Production of Documents		
3	to Plaintiff John aka Jack Silva		
4	Defendants, MGM Grand Hotel, LLC and MGM	2/23/15	MGM
5	Resorts International d/b/a MGM Grand Las Vegas		pending
6	Second Set of Interrogatories to Plaintiff Jacqueline		
7	Escobar		
8	Defendants, MGM Grand Hotel, LLC and MGM	2/23/15	MGM
9	Resorts International d/b/a MGM Grand Las Vegas		pending
10	Second Set of Request for Production of Documents		
11	to Plaintiff Jacqueline Escobar		
12	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	2/25/15	ESCOBAR & SILVA
13	Notice of Taking Videotaped, Videoconference		completed
14	Deposition of Dr. Michael H. Metzler		
15	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's	3/4/15	ESCOBAR & SILVA
16	Notice of Taking Videotaped, Videoconference		vacated
17	Deposition of Dr. Christopher J. Fisher	3/12/15	ESCOBAR & SILVA
18	Plaintiffs, Jacqueline Escobar & John aka Jack Silva's		vacated
19	Revised Notice of Continuing 30(b)(6) Deposition of		
20	Bob Gail		
21	Plaintiffs, Jacqueline Escobar & John aka Jack	3/12/15	ESCOBAR & SILVA
22	Silva's Initial Expert Witness Disclosure		completed
23	Defendants Joint Initial Expert Witness Disclosure	3/12/15	DEFENDANTS
24			completed
25	Defendant, Jel Events, Inc. d/b/a AlliedPRA		JEL EVENTS
26	Destination Management Las Vegas Seventeenth	3/13/15	completed
27	Supplement to FRCP 26(a)(1) List of Witnesses and		
28	Documents		
29	Defendant, Jel Events, Inc. d/b/a AlliedPRA		JEL EVENTS
30	Destination Management Las Vegas Eighteenth	3/17/15	completed
31	Supplement to FRCP 26(a)(1) List of Witnesses and		
32	Documents		
33	Defendant, Jel Events, Inc. d/b/a AlliedPRA		JEL EVENTS
34	Destination Management Las Vegas Nineteenth	3/30/15	completed
35	Supplement to FRCP 26(a)(1) List of Witnesses and		
36	Documents		

Defendants First Supplement to Joint Initial Expert Witness Disclosure **4/2/15** **DEFENDANTS completed**

Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Third Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1) **4/2/15** **BOB GAIL completed**

Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Fourth Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1) **4/3/15** **BOB GAIL completed**

Defendant, Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas Fifth Supplement to Disclosures Made Pursuant to LR 26-1 and FRCP (a)(1) **4/6/15** **BOB GAIL completed**

Defendant, Jel Events, Inc. d/b/a AlliedPRA Destination Management Las Vegas Twentieth Supplement to FRCP 26(a)(1) List of Witnesses and Documents **4/8/15** **JEL EVENTS completed**

In addition to the above referenced discovery, the following depositions have occurred in Las Vegas, Nevada through April 6, 2015:

- Dr. Abraham Mintz completed
- Dr. Mark Godfrey completed
- Dr. Solomon Aordkian completed

In addition, to the above discovery, subpoena duces tecums were forwarded to other treating providers which were discovered during the depositions conducted in Boston. These providers' requests are presently pending, which include:

- White Plains Radiology
- Hartford Hospital - Head Injury Clinic

Lastly, in addition to the above subpoenas which have been served and presently pending, information regarding Plaintiff, Jacqueline Escobar's prior motor vehicle accident from the following:

- Scott Barron & Associates, P.C. in Howard Beach, New York
- Rojas Law Firm, in Hartford, Connecticut

Depositions of the experts will likewise need to be taken. It is anticipated that the depositions will occur within the next 3 to 4 months, if the parties have not reached a settlement agreement on **May 19, 2015**. Aside from medical experts, other safety related experts, if any, need to be disclosed, review necessary deposition testimony, prepare reports and be deposed.

It is required under 26(4)(c) to define why the deadlines were not satisfied. The parties have worked cooperatively together and have expended significant effort to undertake discovery in this case. Unfortunately, due to all parties scheduling conflicts the mediation was scheduled after the discovery cutoff date **May 11, 2015** and given the physicians scheduling conflicts, procurement for additional records, discovery of additional physicians needing to be deposed; all remaining discovery could not be completed within the 90 day window afforded by the prior order. None of the parties have cancelled discovery, nor undertaken in any way to postpone the discovery process for delay and all parties have fully cooperated to move forward. All parties are working cooperatively to mediate, and finalize discovery in a timely and expedited manner, but given the time restraints, scheduling conflicts, volume of discovery and the logistics of traveling from east to west coast, additional time is respectfully required and requested.

Finally, under LR 26(4), it is necessary to articulate a proposed schedule for completing all remaining discovery. Given that mediation has been scheduled after the discovery cutoff date and the amount of discovery still needing to be done, it is requested that an additional 90 days be afforded for discovery. The following deadlines are requested.

- | | |
|--|-----------------|
| 1. Discovery Cutoff Date: | August 10, 2015 |
| 2. Motions to amend pleadings and add parties: | May 13, 2014 |

- | | |
|----------------------------------|-------------------|
| 3. Expert Designations: | March 12, 2015 |
| 4. Rebuttal Expert Designations: | April 13, 2015 |
| 5. Interim Status Reports: | June 11, 2015 |
| 6. Dispositive Motions: | September 9, 2015 |
| 7. Joint Pre-Trial Order: | October 9, 2015 |

The parties hereby stipulated to the proposed changes in the discovery deadlines.

<p>Dated this <u>12</u> day of May, 2015</p> <p>CORSO LAW LLC</p> <p>/s/ Frank C. Corso, Esq.</p> <hr/> <p>FRANK C. CORSO, ESQ. (<i>Pro Hac Vice</i>) 492 Winthrop Street, Suite 5 Rehoboth, MA 02769 Telephone: (774) 901-2677 Facsimile: (774) 901-2678</p> <p>and</p> <p>Andre M. Lagomarsino, Esq. & Daniel M. Ryan, Esq. PARKER SCHEER LAGOMARSINO 9555 South Eastern Avenue, Ste 210 Las Vegas, Nevada 89123 Attorneys for Jacqueline Escobar & John aka Jack Silva</p>	<p>Dated this <u>12</u> day of May, 2015</p> <p>THORNDAL ARMSTRONG, DELK, BALKENBUSH & EISINGER</p> <p>/s/ Brian K. Terry, Esq.</p> <hr/> <p>Brian K. Terry, Esq. P.O. Box Drawer 2070 Las Vegas, Nevada 89125 Attorney for Jel Events, Inc d/b/a AlliedPRA Destination Management Las Vegas</p>
<p>Dated this <u>12</u> day of May, 2015</p> <p>BREMER, WHYTE, BROWN & O'MEARA, LLP</p> <p>/s/ Jared G. Christensen, Esq.</p> <hr/> <p>Jared G. Christensen, Esq. 1160 N. Town Center Drive, Ste. 250 Las Vegas, Nevada 89128 Attorneys for MGM Grand Hotel LLC and MGM Resorts International</p>	<p>Dated this <u>12</u> day of May, 2015</p> <p>PYATT SILVESTRI</p> <p>/s/ Robert P. Molina, Esq.</p> <hr/> <p>Robert P. Molina, Esq. & James P.C. Silvestri, Esq. 701 Bridger Avenue, Ste. 600 Las Vegas, Nevada 89101 Attorneys for Bob Gail Enterprises, Inc d/b/a Bob Gail Special Events Las Vegas</p>

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 13, 2015

The **JOINT STIPULATION AND ORDER TO EXTEND DISCOVERY (FOURTH REQUEST)** in 2:13-CV-01917 was submitted by:

CORSO LAW LLC

/s/ Frank C. Corso, Esq.

FRANK C. CORSO, ESQ. (*Pro Hac Vice*)
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